

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYSHAWN HOLMES,

Defendant.

Case: 4:23-cr-20347

Assigned To : Behm, F. Kay

Referral Judge: Ivy, Curtis, Jr

Assign. Date : 6/16/2023

Description: INFO USA V. HOLMES (NA)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

21 U.S.C. §§ 846 and 841(a)(1)

Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl

Beginning sometime in March 2023, and continuing until about March 21, 2023, in the Eastern District of Michigan and elsewhere, RAYSHAWN HOLMES, knowingly conspired and agreed with other persons to distribute and possess with intent to distribute fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). The conspiracy as a whole involved 400 grams or more of fentanyl, an amount attributable to HOLMES based on his own actions and the actions of others reasonably foreseeable to him. All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and 841(b)(1)(B)(vi).

FORFEITURE ALLEGATION
21 U.S.C. § 853; Criminal Forfeiture

The allegations contained in this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853 and Federal Rule of Criminal Procedure 32.2.

Pursuant to Title 21, United States Code, Section 853, upon conviction of the Count One offense in violation of Title 21, United States Code, Sections 846 and 841, defendant, RAYSHAWN HOLMES, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

Property to be forfeited includes, but is not limited to, the forfeiture of the defendant's interest to the United States in the following property:

- One (1) Glock 19, semi-auto pistol with mounted tactical light, bearing serial number TTR326;
- One (1) High Capacity Magazine
- Thirteen 13 rounds of 9 mm ammunition


If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: June 16, 2023

DAWN N. ISON
United States Attorney



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ANTHONY P. VANCE (P61148)
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Chief, Branch Offices

Companion Case information MUST be completed by AUSA and initialedUnited States District Court
Eastern District of Michigan**Criminal Case Cover Sheet****Case Number**
4:23-cr-20347

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: NAA

Case Title: USA v. RAYSHAWN HOLMES**County where offense occurred:** Genesee County**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty** Indictment/ Information --- **no** prior complaint. Indictment/ x Information --- based upon prior complaint (23-mj-30112) Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information****Superseding to Case No:** _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)****Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

Date: June 16, 2023

s/NANCY A. ABRAHAM

Nancy A. Abraham.

Assistant United States Attorney

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Attorney Bar #: P-42060

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.